



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AZ  
3/15/99

VIA TELEFAX AND  
REGULAR MAIL

REPLY TO THE ATTENTION OF

March 15, 1999

Tim Healy  
ENTACT  
1360 North Wood Dale Road, Suite A  
Wood Dale, Illinois 60191

EPA Region 5 Records Ctr.



257859

Dear Mr. Healy:

The U.S. Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers (ACE) have reviewed the critical portions of the Remedial Action (RA) Work Plan-Pile for the NL Industries/Taracorp Superfund Site in Granite City, Illinois (the NL Site). The EPA hereby approves these portions of the RA Work Plan-Pile with the following modifications:

1. Page 17, Section 4.6.2.2, Second Paragraph, fourth sentence- "in the exclusion zone only" is inserted between "suppression" and "or".
2. Page 18, Section 4.10, first sentence- "NL Site boundary" is replaced with "Industrial Area boundary" and "and, to the extent possible, in the work zone" is inserted between "line" and "during".
3. Page 19, First Full Paragraph, last sentence- "may" is replaced with "will, to the extent possible".
4. Page 19, Fourth Full Paragraph- "Equipment operators will be informed of and required to use dust minimization techniques during any intrusive activities." is added to the end of this paragraph. Dust minimization techniques include such measures as not dropping materials from great heights, working on the lee side of the pile when possible, and not overfilling buckets.
5. Page 25, First Full Paragraph, first sentence- "and with EPA or their designee's approval" is added to the end of this sentence.
6. Page 26- Section 5.3.6 is added as follows: **"5.3.6 AIR MONITORING DATA**  
All air monitoring data shall be maintained on-site and made available to EPA, upon request."
7. Page 32, Section 5.6.1, first sentence- "backfill" is inserted between "industrial" and "criterion" and "criterion" is replaced with "criteria". A new second sentence is added as follows: "Residential-generated fill with a lead concentration up to 1000 ppm can be used for backfill on the industrial site, with the exception that the final 12 inches of backfill (i.e. 0-12

inches depth from surface) must have a lead concentration less than 500 ppm."

8. Page 41, Section 6.1, second sentence- "outside the footprint" is inserted between "vegetation" and "that".

9. Page 41, Section 6.1, Second Paragraph, first sentence- "to be grubbed and in areas indicated" is deleted.

10. Page 44, Section 6.4.4, fourth sentence- "as random fill" is inserted between "pile" and "and".

11. Page 44, Section 6.4.4 Second Paragraph- ", unless physical observations indicate that materials in the drums may be other than metal-containing waste (such as solvents)" is added to the end of this paragraph.

12. Page 46, Second Full Paragraph, first sentence- "1000 mg/kg criterion is" is replaced with "industrial backfill criteria are".

13. Page 46, Second Full Paragraph, second sentence- "as random fill" is inserted between "Pile" and "or".

Additionally, the following minor comments are submitted for your consideration. These comments are not required modifications:

1. Page 14, Section 4.3- It is recommended that a Site Security person to double as a property or supply custodian/utility man be included in the Project Management Team.

2. Page 15, Section 4.3, Second Subparagraph- It is highly recommended that warning signs posted on the perimeter fences shall read as follows: "HAZARDOUS WORK AREA" and "DO NOT ENTER UNLESS AUTHORIZED".

3. Page 16, Section 4.5- It is highly recommended that a separate field office be provided for EPA and USACE personnel use in order to maintain privacy during discussion of issues in the course of the project. This setup will also foster a more professional relationship between USACE and Contractor field personnel and still maintain effective interaction and communication. If a trailer is provided it should be at least 10 ft X 20 ft. Also provide and maintain drinking water facilities, adequate lighting, local and long distance telephone service with three lines, heating and air conditioning, a portable chemical toilet, a computer, a printer/copier/fax machine, a two-way radio, a microwave oven and a small refrigerator similar to that furnished for the stack emissions field office. The field office shall be furnished with one legal size filing cabinet with four drawers, one drafting table with stool, one plan rack, one desk and three chairs. Used furniture in good condition may be acceptable. Entrance doors shall be

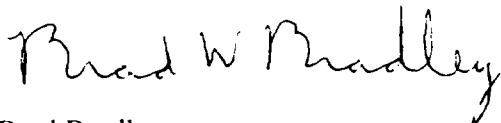
equipped with a substantial lock. The contractor shall provide and maintain the heating and air conditioning facilities, electricity, telephone, water, and weekly janitorial service at no cost to the Government. The entire facility including furniture, shall remain the property of the contractor and shall be removed from the site after completion of the work. Keys to all ingress/egress gates shall be provided to the Government at no additional cost.

4. Page 18, Section 4.9, Second Paragraph, second sentence- "NL Industries" should be substituted for "USEPA".

5. Page 25, Section 5.3.1- In this section, an explanation of the logic of using TSP monitoring for lead emissions should be provided (i.e. assuming 10,000 ppm lead, 0.15 mg/cubic meter of TSP would equal 1.5 ug/cubic meter lead).

Since the critical portions are approved as modified above, work can commence immediately on the applicable portions of the capping project. EPA will issue a comment letter on the entire RA Work Plan-Pile by March 31, 1999. If you have any questions concerning this document, please contact me at (312) 886-4742.

Sincerely,



Brad Bradley  
Remedial Project Manager

cc: Bob Rogers, Illinois EPA  
Charlie Settles, U.S. ACE